

CLARIFICATION NUMBER CAO-00-045, REV. 0
ADEQUACY OF ACCEPTABLE KNOWLEDGE
(SECTION B-3d(2))

ISSUE

1. What is considered "inadequate" acceptable knowledge.
2. If the waste was characterized when it was repackaged, will it have to be characterized a second time?
3. Is it acceptable to select a waste stream, develop acceptable knowledge for it, and then identify which containers will make up the waste stream?

CONCLUSION

1. Acceptable knowledge is inadequate if it fails to contain any of the data specified in Section B4-2 of the permit. The adequacy of acceptable knowledge is verified by the Permittees when conducting audits. Section B4-3e states "The acceptable knowledge record shall contain 100 percent of the information specified in Section B4-2. The usability of the acceptable knowledge information will be assessed for completeness during audits."
2. If the waste was characterized when it was repackaged, but the acceptable knowledge was inadequate, it must be recharacterized so the acceptable knowledge requirements are met.
3. It is acceptable to select a waste stream, develop acceptable knowledge for it, and then make a final determination of which containers will make up each waste stream.

DISCUSSION

1. Attachment B4-2 states, "The Permittees shall obtain from each Department of Energy (**DOE**) TRU mixed waste generator/storage site (**site**) a logical sequence of acceptable knowledge information that progresses from general facility information (TRU Mixed Waste Management Program Information) to more detailed waste-specific information (TRU Mixed Waste Stream Information). Traceability of acceptable knowledge information for a randomly selected drum in the audited Waste Summary Category Group(s) will be examined during the Permittees' audit of a site (Section B4-3f). The consistent presentation of acceptable knowledge documentation among sites in auditable records¹ will allow Waste Isolation Pilot Plant (**WIPP**)

¹ "Auditable records" mean those records which allow the Permittees to conduct a systematic assessment, analysis, and evaluation of the Permittees compliance with the WAP and this Permit.

personnel to verify the completeness and adequacy of acceptable knowledge for TRU mixed waste characterization during the audit process.”

2. Permit Attachment B-3d(2) states:

Repackaged retrievably stored waste, or any retrievably stored waste with inadequate acceptable knowledge, will be characterized using either the retrievably stored or newly generated waste characterization process, whichever results in greater sampling requirements.

If the waste was characterized when it was repackaged, but the acceptable knowledge is later found to be inadequate, the waste must be recharacterized so the acceptable knowledge requirements are met.

3. Section B-3d(2) states:

All retrievably stored waste containers will first be delineated into waste streams using acceptable knowledge.

Some degree of acceptable knowledge will always be used at the outset of the waste characterization process to make a preliminary determination of waste stream Summary Category Groups. This first level determination, however, does not imply that all acceptable knowledge required by the Permit is available at the time the waste is first delineated into waste streams nor does it assume that, as additional acceptable knowledge documentation is assembled, the sites will not need to revise their determinations relative to which drums belong in which waste streams.